AMO REPORTS 86-7

RESPONSE TO THE PROVINCIAL GOVERNMENT DISCUSSION PAPER "PAY EQUITY"

THE ASSOCIATION OF MUNICIPALITIES OF ONTARIO
May, 1986

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ASSOCIATION OF MUNICIPALITIES OF ONTARIO

The Association of Municipalities of Ontario, a non-partisan voluntary organization, is united to promote the values of the municipal government system and the status of the municipal level of government as a vital and essential component of the total intergovernmental framework of Ontario and Canada.

The Association acts as the collective voice of Ontario's municipal governments and is organized to accomplish through cooperation and coordination, what the majority have neither the time nor the resources to do individually.

The Association represents some six hundred (600) municipal governments throughout Ontario. The governing body is composed of some eighty (80) municipal elected and appointed officials, who in turn represent a wide-range of municipal government interest.

The following sections and affiliated municipal professional associations form an important part of the Association's structure and therefore, play an important part in its activities in terms of the Board of Directors, program and policy development:

Association Sections:

* County and Regional Section
* Large Urban Section
* Northern Ontario Section (FONOM/NOMA)
* Rural (ROMA) Section
* Organization of Small Urban Municipalities Section

Association Affiliates:

* Association of Municipal Clerks and Treasurers of Ontario
* Association of Municipal Tax Collectors of Ontario
* Municipal Engineers Association
* Ontario Municipal Administrators Association
* Ontario Municipal Personnel Association
* Ontario Municipal Social Services Association
* Society of Directors of Municipal Recreation of Ontario

To the Municipal Clerk:

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The Association's response to the Provincial Government's discussion paper on "Pay Equity" was transmitted on April 28, 1986, to the Honourable Ian Scott, Minister Responsible for Women's Issues, to the Honourable William Wrye, Minister of Labour, and the Honourable Bernard Grandmaitre, Minister of Municipal Affairs.

AMO RESPONSE TO
PROVINCIAL "GREEN PAPER ON PAY EQUITY"

Overview:

The Association of Municipalities of Ontario wishes to state at the outset that it shares the commitment expressed by the government in the opening statement of the Green Paper on Pay Equity, namely that "the achievement of equal opportunity and social justice for all Ontarians (should be) fundamental and unalterable".

This commitment places Ontario in the forefront of jurisdictions giving heightened recognition to the rights of individual workers, for which the government is to be commended. The government is also to be commended for both its honest identification of some of the key pay equity implementation issues contained in the Green Paper and its expressed desire to engage in extensive consultation. AMO is encouraged by the government's ongoing willingness to engage in consultation prior to drafting legislation. This has certainly demonstrated to AMO that the government retains an open mind on solutions to identified problems and takes into account the potential impact on all parties affected.

In this context, AMO is concerned that the government has stated, with such emphasis, that "... the implementation of equal pay for work of equal value is not at issue". Indeed, this may lead many to believe that pay equity is the government's only or prime solution to a complex and difficult problem when in fact pay equity, as has been stated in the Green Paper, is part of employment equity. To this end, the government needs to continually re-iterate this fact so that pay equity is not viewed out of context.

AMO views pay equity as a strategy that seeks to modify or adjust an individual's level of pay in economic terms, based on some universally applicable criteria, such as value to the employer. AMO views employment equity as a strategy that seeks to broaden the employment opportunites available to individuals who have not had such opportunites or have not been given opportunities to obtain required qualifications for certain types of employment. In short, AMO views pay equity as a strategy that has, as its main focus, the requirements of the job and its appropriate level of pay. An employment equity strategy has as its focus the requirements of the job and the qualifications of the individual. Given this, there is little doubt that employment equity and pay equity must be linked together in order to bring about

change. Accordingly, AMO is convinced that the achievement of greater workplace equity is dependent upon both effective pay equity and employment equity programs.

AMO is pleased to respond to the central questions posed by the Green Paper and would welcome the opportunity to consult with the government on the issue of employment equity.

Summary of Recommendations:

1. AMO recommends that:

   for the municipal sector, "establishment" be defined as that which covers all jobs within the municipal corporation subject to differences in pay outcomes attributed to negotiated versus arbitrated settlements arising from differences in collective bargaining legislation.

2. AMO recommends that:

   in establishing acceptable levels of gender predominance to be used for pay equity provisions, the employer should set levels that are approved by the enforcement agency.

3. AMO recommends that:

   a. minimum standards for the determination of value be established for employers to apply with job evaluation, and

   b. in conjunction with these standards, guidelines for application be developed by the enforcement agency that specifically include:

      i. samples of acceptable job evaluation plans deemed to be gender-neutral and that span the known methods of job evaluation, and

      ii. samples of gender-neutral questionnaires that can be used for data collection in conjunction with the job evaluation plan.

4. AMO recommends that:

"equal pay" be defined to include hourly earnings, benefits, pay for time not worked, non-wage factors and working conditions.

5. AMO recommends that:

the list of allowable exceptions justifying a compensation disparity should include:

a. performance rating systems
b. negotiated or arbitrated pay rates
c. seniority
d. red-circling
e. rehabilitation assignments
f. regional rates of pay
g. inflationary conditions
h. demotion pay procedures
i. working conditions
j. phased-in wage reductions
k. temporary training
l. premiums paid due to a labour shortage
m. change of work performed

6. AMO recommends that:

a. there be established a threshold of a minimum number of employees applicable to the municipal workforce such that,

   i. above the threshold the pay equity model would be an integrated model consisting of an employer-initiated pay-equity plan and a complaint system, and

   ii. below the threshold the pay equity model would be limited to a complaint system,

   and that,

b. the government consult with AMO on the actual size of the threshold to be used.

c. pay-equity legislation should not preclude the possibility of requiring the parties to negotiate pay-equity plans and these plans should be negotiated separately from other matters affecting the collective agreement. However, in the event of an impasse during such negotiations, AMO recommends recourse to a non-binding form of third-party intervention and specifically recommends against the use of any binding form of third party resolution.

d. jobs grouped according to female-predominance and male-predominance be done so only for the purposes of pay equity provisions.

7. AMO recommends that:

a. under both the pay equity plan provisions and the complaint provisions, the employer not be required to commit more than 1% of the previous year's payroll applicable to the bargaining unit or non-bargaining unit as the case may be for pay equity adjustments.

b. where jobs, whose costs are shared with the provincial government in accordance with a provincial-municipal program funding ratio are covered by a pay equity plan, all pay equity costs associated with those jobs should be shared with the provincial government using the same ratio, and municipal transfer payments should be increased in accordance with the provincial government's share of the pay-equity cost liability.

8. AMO recommends that:

the existing knowledge and expertise of the Employment Standards Branch serve as the enforcement agency.

9. AMO recommends that:

With respect to carrying out its enforcement function and the issuing of orders where complaints are lodged, AMO recommends that:

a. the agency be given the latitude to mediate disputes between the complainant and respondent before it issues an award.

b. there be a fixed time period on the order of six (6) months from the time the complaint is lodged to the time an order is issued.

c. orders issued by the enforcement agency be made effective on the date the order is issued.

d. in making adjustments to wages as part of implementing the enforcement agency's order, an employer be permitted to maintain the option of moderating the wage increases of jobs deemed to be overpaid.

e. employers be permitted to appeal the timing or phasing-in of an order on the basis of being unable to accommodate the time-frame for the implementation of the order.

f. individuals or groups of individuals, without giving regard to gender, be permitted to lodge complaints.

10. AMO recommends that:

the period between proclamation of the legislation and the date pay equity plans are to be first developed or a complaint may first be lodged, as the case may be, be a minimum of one year.

11. AMO recommends that:

legislation for pay equity supercede all existing and future collective bargaining legislation.

Definition of Establishment

1. AMO recommends that:

> **for the municipal sector, "establishment" be defined as that which covers all jobs within the municipal corporation subject to differences in pay outcomes attributed to negotiated versus arbitrated settlements arising from differences in collective bargaining legislation.**

AMO recognizes that the effect of a pay equity strategy is minimized if establishment is defined along bargaining unit lines. It must be recognized that not all jobs undergo comparable wage determination processes. Through negotiations, some salaries are set locally, others are set province-wide and still others are the result of arbitration. As such, pay disparities can be justified by differences arising from negotiated versus arbitrated settlements and can be traced directly to differences in collective bargaining legislation - an outcome that is totally unrelated to gender-bias. For this reason, the definition of "establishment" must be sensitive to the fact that not all employees are exposed to the same form of collective bargaining legislation.

Gender Predominance

2. AMO recommends that:

> **in establishing acceptable levels of gender predominance to be used for pay equity provisions, the employer should set levels that are approved by the enforcement agency.**

AMO notes that, similar to developing a proper definition for "establishment", setting an appropriate level for gender predominance is the key to the effectiveness of pay-equity plans. A specific cut-off may not be appropriate for all employers since to some it may be too low a threshold and unduly place the burden of pay equity on the employer while for others it may be too high a threshold and not cover all employees for which pay equity was intended. Since the gender make-up of workforces in similar jobs will vary across employers and since pay equity plans in general cannot be anything short of employer-specific, so too should the level of gender predominance.

Additionally, when setting levels, historical patterns of gender predominance should be taken into account since there can be jobs within the same organization whose gender make-up will fluctuate. Where large swings in predominance occur, it cannot reasonably be held that the job is predominated by one sex.

The agency could set guidelines for levels that take into account the size of the workforce and a corresponding reasonable period of gender stability that must hold true in order for a particular job to be considered gender predominated. These could then serve to assess the appropriateness of gender predominance levels set by the employer.

Determination of Value

3. AMO recommends that:

a. minimum standards for the determination of value be established for employers to apply with job evaluation, and

b. in conjunction with these standards, guidelines for application be developed by the enforcement agency that specifically include:

i. samples of acceptable job evaluation plans deemed to be gender-neutral and that span the known methods of job evaluation, and

ii. samples of gender-neutral questionnaires that can be used for data collection in conjunction with the job evaluation plan.

Inherent to the concept of value is the fact that it is employer-specific and problems would arise for enforcement if no universally applicable standards are available. Minimum standards also ensure that all employers would implement pay equity from the same base.

AMO envisions such standards to include gender-neutral definitions of factors that will be used to assess value.

Since, from a pragmatic perspective, the assessment of value in a gender-neutral fashion is likely to be a new concept to employers, the agency should make available samples of gender-neutral job evaluation plans and data collection tools for guidance.

Definition of Equal Pay:

4. AMO recommends that:

> **"equal pay" be defined to include hourly earnings, benefits, pay for time not worked, non-wage factors and working conditions.**

When considering compensation, there is a tendency to consider only the wage portion and to this extent, only annual earnings. For an accurate comparison of wages across different jobs, it is necessary to do so on a "same unit" basis. Since employees in different organizations or in different jobs may work different hours it is necessary to perform the comparison by discounting the difference in the earnings attributed to hours worked.

An important aspect of compensation is the benefit package offered to employees that, in the last ten years, has grown to represent as much as 30% of total compensation. In general, some employers, especially small establishments harder hit with fluctuations in business cycles and therefore unable to pay their employees with wages per se, are likely to substitute a better fringe benefit package for an increase in wages. By so doing, they are able to defer their labour costs to periods when business has improved and costs can be better borne.

To the extent that employees are compensated for disagreeable or hazardous conditions of employment, it is suggested that employees should and do receive premium wages for exposure to such conditions. However some employers, who are unable to afford the payment of such premiums, find it more cost effective to reduce the disagreeable or hazardous conditions of work. In essence, dollars are substituted for a better work environment. For this reason, it is important to recognize working conditions as one form of compensation.

Finally, although not as easily quantifiable, employees often receive other non-wage or non-pecuniary forms of compensation. One that is quite often cited in the public sector is that the government serves as a model for other employers. To the extent that the public sector must maintain its cost-minimizing objectives and still be able to attract qualified workers, such non-pecuniary aspects are proxies for pure wages. Thus, these forms of compensation must be taken into account.

By not recognizing all of these components of total compensation, an incomplete picture results. In addition, including all such aspects in the definition of equal pay affords greater flexibility in ensuring compliance with pay equity provisions.

Allowable Exceptions:

5. AMO recommends that:

the list of allowable exceptions justifying a compensation disparity should include:

a. performance rating systems
b. negotiated or arbitrated pay rates
c. seniority
d. red-circling
e. rehabilitation assignments
f. regional rates of pay
g. inflationary conditions
h. demotion pay procedures
i. working conditions
j. phased-in wage reductions
k. temporary training
l. premiums paid due to a labour shortage
m. change of work performed

AMO notes that the intent of pay equity legislation is to close the wage gap attributable only to wage discrimination and occupational segregation. However, a gap may exist for any of many non-gender related factors.

Before a pay adjustment can be made to close that portion of the gap related to wage discrimination and occupational segregation, any identified gap must first be discounted by factors unrelated to either. Only the shortfall remaining after these factors have been taken into account need be adjusted. The onus should rest upon the employer to quantifiably demonstrate the magnitude of the gap attributable to one or more of the above-listed factors.

Model of Implementation

6. AMO recommends that:

a. there be established a threshold of a minimum number of employees applicable to the municipal workforce such that,

i. above the threshold the pay equity model would be an integrated model consisting of an employer-initiated pay-equity plan and a complaint system, and

ii. below the threshold the pay equity model would be limited to a complaint system,

and that,

b. the government consult with AMO on the actual size of the threshold to be used.

During September-October of 1985, AMO conducted a survey of municipal job evaluation practices. Of the 333 responses received, 83% of respondents indicated that no formal system of job evaluation was in place. These were primarily municipalities with populations under 50,000.

One of the leading reasons cited for not having a system was the small size of the workforce. As a result, job structures in these municipalities are not complex. In some instances, a job may have as few as one incumbent or a job class may contain as few as one job. Where this is the case, definitions of "female-predominance" and "male-predominance" would carry little meaning and it would seem unreasonable to expect smaller municipalities to bear the expense of a sophisticated job evaluation system for the assessment of a handful of jobs.

However, this does not preclude situations where pay inequities may exist. In order that such inequities are addressed, employees should have some form of recourse.

For those with a size of workforce above the threshold and therefore required to bring about pay equity using a pay

equity plan, minimum standards for plan provisions, such as those in the Ontario Public Service Pay Equity Act, 1986, should be provided in the legislation. AMO notes that this Act stipulates:

i. the establishment of a gender-neutral job comparison or evaluation system,

ii. identification of predominantly female groups of jobs and pre-dominantly male groups of jobs,

iii. the application of (i) to (ii), and

iv. the method for pay adjustment.

AMO agrees with the Green Paper that pay equity plans should be initiated by the employer but does not preclude the legislation requiring plans to be negotiated jointly with the bargaining agent where one is present. To this end, the following recommendations are made.

AMO recommends that:

c. **pay-equity legislation should not preclude the possibility of requiring the parties to negotiate pay-equity plans and these plans should be negotiated separately from other matters affecting the collective agreement. However, in the event of an impasse during such negotiations, AMO recommends recourse to a non-binding form of third-party intervention and specifically recommends against the use of any binding form of third party resolution.**

AMO believes that pay equity plans will become employer specific since they are to include the application of job evaluation and the assessment of value - both of which are, in and of themselves, employer specific. Accordingly, if these will have to be tailored to the make-up of the organization, the best form of pay-equity plan to emerge from negotiations will be one upon which the parties have mutually agreed. AMO believes that the parties should be given every opportunity to reach a settlement.

For more than a decade, AMO has expressed its serious reservations about the efficacy of the arbitration process in this province. In particular, AMO has expressed its reservations over the fact that arbitrators are not given and are not compelled to follow a specific set of criteria when issuing awards. A legislated job evaluation model that resolves impasses through quick access to arbitration would amplify the distortions created by the existing arbitration process. Although in some circumstances it may be inevitable that arbitration is required, the thrust of the legislation should be to limit access to arbitration and permit it only when absolutely necessary.

If arbitration is to be considered by the government for use during impasses, a necessary prerequisite for arbitrators to provide well-justified awards would be a well-developed expertise on the technical aspects of job evaluation and its limitations. Given the areas of expertise of current arbitrators, an expertise in this area is unlikely to be developed for quite some time. Indeed, the need for "super arbitrators" would be high, requiring them to possess, at minimum, advanced knowledge in each of labour law, job evaluation, wage-setting practices and the economics of compensation. Extensive training must therefore be provided in order to develop such arbitrators.

AMO recommends that:

d. jobs grouped according to female-predominance and male-predominance be done so only for the purposes of pay equity provisions.

For the purpose of identifying pay inequities, the legislation may require the altering of job groupings or classes such that female-predominated jobs themselves and not merely female-predominated job classes are covered by the plan. Where this is the case, normal relationships of jobs structured by the employer to fit the nature of work performed could be changed. This would have the effect of eroding the employer's right to classify jobs - a right that many arbitrators have upheld in favour of the employer.

Pay Adjustments

7. AMO recommends that:

a. under both the pay equity plan provisions and the complaint provisions, the employer not be required to commit more than 1% of the previous year's payroll applicable to the bargaining unit or non-bargaining unit as the case may be for pay equity adjustments.

The ceiling for adjustments affords the employer an opportunity to know future costs and plan the municipal budget accordingly. Additionally, the phasing-in of adjustments ensures lesser disruption to essential municipal services. AMO notes that such a provision for employer liability is contained in both the Manitoba legislation and the Ontario Public Service Pay Equity Act, 1986.

b. where jobs, whose costs are shared with the provincial government in accordance with a provincial-municipal program funding ratio, are covered by a pay equity plan, all pay equity costs associated with those jobs should be shared with the provincial government using the same ratio and municipal transfer payments should be increased in accordance with the provincial government's share of the pay-equity cost liability.

Ontario municipalities currently deliver a number of what are, by virtue of high rates of expenditure subsidies and highly detailed administrative control, essentially provincial services. Most commonly, these are in the health, geriatric care and social service areas. Wage rates, often comprising 80% or more of these service costs, are determined primarily by provincial government programme funding decisions rather than by municipal pay determination processes.

Municipalities should not be expected to bear the full costs of pay equity applicable to jobs whose costs are essentially shared and detract monies from municipally-funded services. In effect, the partnership that exists between the provincial government and municipalities for the creation of such jobs should continue to hold true in the same proportions even where pay equity applies.

Since these costs constitute new costs, they should not be offset against the transfer payments normally remitted to municipalities. Rather, transfer payments would have to be increased to reflect the additional costs associated with pay equity for program-funded jobs.

The Enforcement Agency

8. AMO recommends that:

the existing knowledge and expertise of the Employment Standards Branch serve as the enforcement agency.

A new enforcement agency would require large financial and human resource commitments. The Employments Standard Branch has developed substantial experience in enforcing the existing legislation with respect to equal pay for equal work. Since equal pay for work of equal value is an extension of equal pay for equal work, enforcement of pay equity legislation by the Employment Standards Branch would seem to be a logical extension of its function.

During the period where employers are required to establish pay equity plans, the agency would serve to monitor plan developments, ensure conformity with the legislation and establish guidelines for the formulation of plans. For situations where complaints are lodged, it would serve as the adjudicator.

To the extent that employers will recognize that it is more cost and time effective to take preventative steps to ensure that complaints do not occur, such an agency should supplement its activities with extensive training on in-house job evaluation development. The agency would likely keep a range of plans that span the four methods of job evaluation so that training could be offered to provide a method posing the least administrative expense. AMO notes that the Employment Standards Branch also possess the expertise to train and advise employers.

Administering the Enforcement Function

9. AMO recommends that:

With respect to carrying out its enforcement function and the issuing of orders where complaints are lodged, AMO recommends that:

a. the agency be given the latitude to mediate disputes between the complainant and respondent before it issues an award

This process, currently practiced by the Ontario Human Rights Commission, would give the parties a chance to attain a mutually satisfactory settlement before an order is issued. Given that the outcome of an individual complaint could affect all incumbents of the job, the employer will likely prefer the opportunity to settle the matter rather than face the prospect of an imposed and perhaps costlier order.

b. there be a fixed time period on the order of six (6) months from the time the complaint is lodged to the time an order is issued

This would ensure that consideration of complaints is not unduly protracted. Presumably, the time period would include a reasonable period to investigate the complaint and for mutual resolution. AMO suggests that this time period be no longer than six (6) months but recognizes that this will depend largely upon the enforcement agency selected.

c. orders issued by the enforcement agency be made effective on the date the order is issued

With a fixed time-frame for hearing the complaint there would be no fear that the complainant would lose earnings because of lengthy hearings. As well, making the order effective on the date it is issued prevents employers from avoiding costs by delaying implementation of the order or, if the employer does delay its implementation, ensures that the complainant is not penalized for the delay. Finally, such an approach guarantees that an employer will not be penalized for the existence of a problem of which it was not aware.

d. in making adjustments to wages as part of implementing the enforcement agency's order, an employer be permitted to maintain the option of moderating the wage increases of jobs deemed to be overpaid

The issue of a particular job being undervalued and hence being underpaid is, in part, a matter of seman-

tics. Depending on which job is to act as the base, it could also be stated that the job to which it is being compared is overvalued and hence overpaid. Allowing employers, especially those of small establishments, to moderate the increases of overpaid salaries grants flexibility by giving the employer an opportunity to accept higher wage bases in gradual increments, thereby spreading the increased labour-costs over several budget periods.

e. employers be permitted to appeal the timing or phasing-in of an order on the basis of being unable to accommodate the time-frame for the implementation of the order

Presumably the enforcement agency in making an order would stipulate a time-frame for implemention. An employer may be unable to comply with such a time-frame. Within the municipal sector, immediate implementation of an award may not always be possible due to the municipal budget year. Municipalities must be given time to properly budget for additional wage expenditures levied by an order so that there is minimum disruption to the levels of services normally provided.

Furthermore, an employer would not have had the opportunity to introduce evidence pertaining to a time-frame since he would not know in advance of any adjustment ordered or the time-frame for implementation. Only evidence justifying the compensation system would be provided. From the employer's perspective, introducing evidence pertaining to time-frames would be tantamount to an admission that the compensation system is faulty.

AMO is not recommending that the employer be able to appeal the compensating portion of the order unless, of course, an error in law has been made in reaching a decision or the enforcement agency somehow overstepped its jurisdiction. Rather, only the time-frame portion would be subject to appeal.

f. individuals or groups of individuals, without giving regard to gender, be permitted to lodge complaints

This recommendation does not preclude employee representatives from advising, counselling or referring individuals to the enforcement agency. However, AMO notes that existing human rights legislation does not permit the employee representative to lodge the complaint on behalf of individuals. Presumably, this ensures that the complainant is serious about the matter and reduces the potential for frivolous complaints.

Phase-In Period for Pay Equity Provision

10. AMO recommends that:

> **the period between proclamation of the legislation and the date pay equity plans are to be first developed or a complaint may first be lodged, as the case may be, be a minimum of one year.**

Municipal employers should be given an opportunity to voluntarily identify and address inequities in order to avert potential complaints. AMO submits that employers will take advantage of this period to rectify or identify inequities. By so doing, they will incur a set of administrative expenses only once and simultaneously reduce the likelihood of future complaints. The alternative for the employer is to incur such expenses repeatedly each time a complaint is lodged. This will constitute a strong inducement for municipal employers to put their affairs in order during the one year "grace" period.

Pay Equity as a Labour Legislation Standard

11. AMO recommends that:

> **legislation for pay equity supercede all existing and future collective bargaining legislation.**

Pay equity legislation would logically be grouped with other pieces of legislation, such as the Human Rights Code, Employment Standards Act and the Occupational Health and Safety Act, that can be generally termed as "standards legislation". Such legislation would in effect be setting minimum standards for wage-setting practices and policies. To ensure that the legislation is not circumvented by existing collective bargaining legislation, the legislation for pay equity must take precedence.

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86-7 Response to the Provincial Government Discussion Paper on "Pay Equity"

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